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THE AMERICAN RADIO RELAY LEAGUE, INC.

INTERNATIONAL SECRETARIAT OF THE INTERNATIONAL AMATEUR RADIO UNION

ADMINISTRATIVE HEADQUARTERS NEWINGTON, CONNECTICUT 06111-1494

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April 14, 1993

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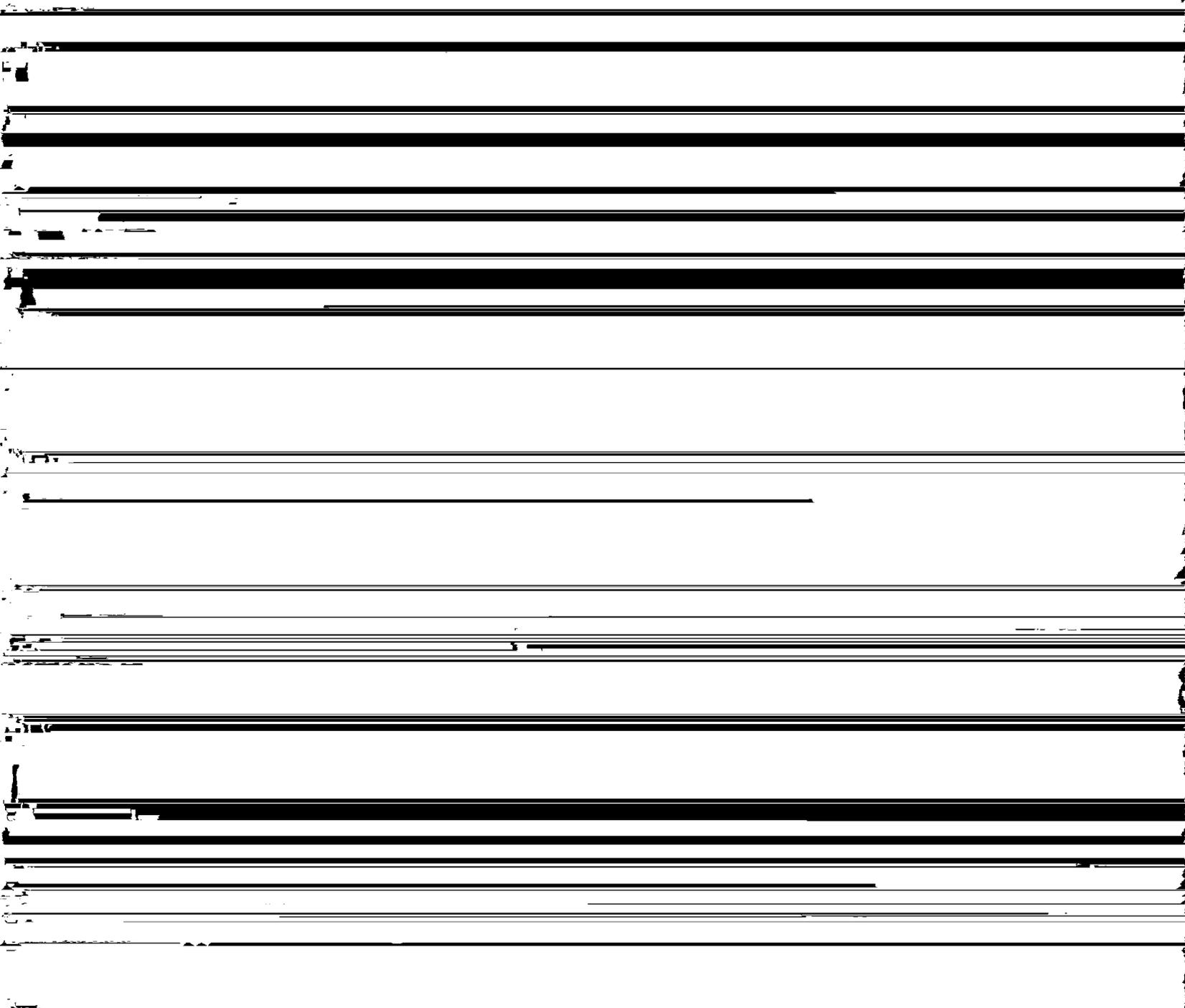
FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

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Via Hand Delivery

Mr. Ralph A. Haller, Chief
Private Radio Bureau
Federal Communications Commission
2025 M Street, N.W. Room 5002

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2. Is this rulemaking proceeding limited to consideration of the

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Our concern about issue #2 is that, to the League, the NPRM is somewhat confusing with respect to the scope of the proceeding. On the one hand, its primary focus is relative to the specific issue of licensee accountability for transmissions to and through (digital) message forwarding systems. On the other hand, it seems to seek far more general input, in the nature of a notice of inquiry. For example, in paragraphs 3 and 4 of the Notice, the following statements appear:

"The objective of this proceeding, therefore, is to ascertain what special rules, if any, should be provided for message forwarding systems."

Therefore, we want to examine our general policy for message forwarding systems."

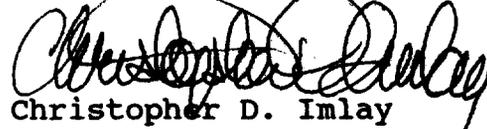
How the League structures its comments, and the nature of the comments that the Commission will receive, is dependent on the perception that is accorded the NPRM by amateurs. The general subject of message forwarding systems, and rules governing the same, is an extraordinarily broad topic, covering subjects such as what digital codes should be permitted at HF in such systems, speeds, frequencies, bandwidths, monitorability, and accountability issues.

The Notice is based on a number of petitions for rule making, each dealing with the subject of the responsibility of the control operator of an amateur station in a message forwarding system for message content (a subject which came to the fore following a series of enforcement actions involving a packet radio transmission during the Gulf War). Because of this, and because the major thrust of the NPRM and the proposed rule changes is aimed at the issue of control operator responsibility of stations in message forwarding, the League believed that the proceeding was intended to be narrowly focused. Because the scope of the proceeding is not clear from the Notice, however, it is requested that this issue be clarified at

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Your early attention to this matter is greatly appreciated.

Yours very truly,

A handwritten signature in black ink, appearing to read "Christopher D. Imlay", written in a cursive style. The signature is positioned above the printed name.

Christopher D. Imlay

cc: John B. Johnston
Maurice DePont, Esq.
William T. Cross